

REMARKS

The Office rejects claims 1-4 in the subject application. Claims 1-4 (1 independent claims; 4 total claims) remain pending in the application. Reconsideration of this application is respectfully requested.

35 U.S.C. § 103 REJECTIONS

The Examiner rejects claims 1-4 under 35 U.S.C. §103(a) as allegedly being unpatentable over Angelo.¹ Applicant respectfully traverses the rejection.

Angelo discloses a device for copy protection of recorded media (e.g., in a DVD system 10). A DVD drive 12 encrypts a disk/media key d_k using drive and video keys, which yields $V_k D_k(d_k)$. $V_k D_k(d_k)$ is then communicated to a video controller 18, where video controller 18 decrypts $V_k D_k(d_k)$ to obtain d_k .² It appears that the Examiner alleges that D_k is the content key and V_k is the internal key of the claim limitation. The Examiner fails to associate d_k with a claim limitation.

In Angelo, $V_k D_k$ is a unique device key. Indeed, this unique device key "is established as the product of $V_k D_k$ and is stored in all of the DVD drives and video controllers". "Once this is complete, all traces of $V_k D_k$ are erased from system memory".³ Significantly, it is $V_k D_k$ that is used in the encryption step to yield $V_k D_k(d_k)$, which is followed by the decryption step (applying $(V_k D_k)^{-1}$) to yield d_k . If the Examiner alleges that D_k is the content key and V_k is the internal key of the claim limitation, then Angelo would need to disclose an encryption step yielding $V_k(D_k)$ followed by a decryption step applying $(V_k)^{-1}$ to yield D_k . But instead, Angelo discloses an encryption step yielding $V_k D_k(d_k)$, which is followed by the decryption step (applying $(V_k D_k)^{-1}$) to yield d_k . In other words, if D_k is the content key of the claim limitation, Angelo uses d_k as the encrypted data and not D_k . Also, if V_k is the internal key of the claim limitation, Angelo uses $V_k D_k$ as the encryption key and not V_k alone. Consequently, Angelo does not disclose when an encrypted content-key is input to the operation section, decrypts the encrypted content-key using the internal-key so as to obtain a content-key as recited in claim 1.

Accordingly, Angelo fails to teach, advise, or suggest "a first decrypting section which, when an encrypted content-key is input to the operation section, decrypts the encrypted content-

¹ U.S. Patent No. 5,923,754, issued July 13, 1999 to Compaq Computer Corporation.

² Angelo, column 4, lines 57-61.

³ Angelo, column 4, lines 31-35.

key using the internal-key so as to obtain a content-key" as recited in claim 1 (and claims 2-4, which depend from claim 1). Thus, because Angelo fails to teach, advise, or suggest one or more of the claimed elements, claims 1-4 are patentable over Angelo. Applicant respectfully requests withdrawal of this rejection.

CONCLUSION

Applicant respectfully submits that the present application is in condition for allowance. Reconsideration of the application is thus requested. Applicant invites the Office to telephone the undersigned if he or she has any questions whatsoever regarding this Response or the present application in general.

Respectfully submitted,

By: S. Shahpar 1-6-05

Shahpar Shahpar
Reg. No. 45,875

SNELL & WILMER L.L.P.
One Arizona Center
400 East Van Buren
Phoenix, Arizona 85004-2202
Phone: (602) 382-6306
Fax: (602) 382-6070
Email: sshahpar@swlaw.com